

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to:

*Matthew Rowenhorst, et al. v. Islamic Republic of Iran (1:18-cv-12387) (GBD) (SN)*

**DECLARATION OF FAMILIAL RELATIONSHIP**

I, John Proodian, declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. My name is John Proodian, and I am the step-son of Richard Thomas Muldowney, Jr., who died on September 11, 2001 when the World Trade Center collapsed. I submit this Declaration for the purpose of demonstrating that Richard Thomas Muldowney, Jr. was the functional equivalent of my father.

2. While I am not Richard Thomas Muldowney, Jr.'s biological son, for the reasons set forth below, I should be deemed the functional equivalent.

3. My parents separated when I was very young in 1992. In 1994, my mother divorced my biological father. I was 4 years old at the time.

4. The same year, Richard Thomas Muldowney, Jr., my stepdad, came into my life when he started dating my mother, Constance Muldowney.

5. Before my stepdad was married to my mother, he would travel significantly between Florida where we lived and New York where he worked as a firefighter with Ladder Co. 7 in Manhattan. *See* Exhibit 1. He always stayed with us and he would come to

Florida about every six weeks or so until we all relocated from Florida to New York to live together in 1998.

6. On June 28, 1998, my stepdad and my mother were married and, along with my sister Kathryn Emma Proodian, we became a family. See Exhibit 2.

7. The same year they were married, my biological father passed away.

8. I always considered my stepdad as a real father in my life, especially after my biological father passed away.

9. As a firefighter, my stepdad worked hard to provide for my mother, me, and my sister. He was the financial support in my family, particularly since we did not receive child support from my biological father.

10. In addition to this financial support, he treated me like his son, emotionally and socially. He would give me advice (and, of course, discipline) like any loving father and as to the outside world, there was no question that “I was his son.”

11. His whole side of the family treated me that way. To this day, I am a considered a “grandson” by my stepdad’s mother who I affectionately call “Mamma” along with her other grandchildren. My children and Kathryn’s daughter, along with Mamma’s other great-grandchildren, call her “Gigi.”

12. He taught me how to play baseball. One of my fondest memories is the summer my stepdad and I drove from Florida to New York for the move ahead of my mother and sister after they were married. We watched baseball games on the road and he showed me his love for the Mets. I am a Mets fan to this day because of my stepdad.

13. I also remember fondly the day of my first communion in 1998 and how my stepdad was there for me. My biological father had recently passed away and my stepdad

stepped in as he told me I was “becoming a man.” In fact, because of my stepdad I stopped using my nickname and starting going by my given name, John.

14. Other favorite memories include my stepdad taking me to go fishing and crabbing near our house in Long Island, being out on the fishing boats from the Captree fleet or friends’ boats, taking family vacations, taking long bike rides, and my stepdad coaching our Little League games. He was always very active in our lives. I really enjoyed having bonding time with him every year for the drill tournaments my stepdad helped set up as a Volunteer firefighter in Freeport, Long Island. *See Exhibit 3.*

15. On September 11, 2001, our family was forever changed.

16. I was 11 years old and living in New York with my stepdad and my family on September 11, 2001.

17. After finding out that my stepdad was one of the missing victims, I remember hoping for a long time that he would be found. I even offered to help find him. When reality set in that my stepdad was never coming back, I took it very hard. To this day, I miss having his fatherly voice and know that it would have guided me through my childhood and now.

18. I was fortunate to be involved in the FDNY’s America’s Camp for children of 9/11 victims. I went to the camp every summer for 10 years, including as a counselor. It was good to spend time with other children of 9/11 victims who were going through the same loss as my sister and I.

19. In sum, Richard Thomas Muldowney, Jr., my stepdad, was very much a father in my life and we considered each-other to be father and son in every way. *See Exhibit 4.*

20. He was in my life for 7 of my 11 years on this earth when he passed away and I will always miss him with fond memories. *See Exhibit 5.*

*[intentionally left blank]*

Executed on: 8/13/19

Name (Signature): J. Proodian

Name (Print): John Proodian

# EXHIBIT 1





# **EXHIBIT 2**















# **EXHIBIT 3**















**SPLASH MOUNTAIN**  
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# **EXHIBIT 4**









# **EXHIBIT 5**















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